



# Location Restriction Criteria - Certification Report

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Public Service Company of Colorado –  
Comanche Station

*CCR Impoundment Pueblo, Colorado*  
October 2018

Revised July 2021

Prepared For:  
Public Service Company of Colorado



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## LIST OF ABBREVIATIONS AND ACRONYMS

ADF Ash Disposal Facility  
AMSL Above Mean Sea Level  
CCR Coal Combustion Residuals  
CDPHE Colorado Department of Public Health and Environment  
CFR Code of Federal Regulations  
CGS Colorado Geological Survey  
EPA U.S. Environmental Protection Agency  
NEHRP National Earthquake Hazards Reduction Program  
PGA Peak Ground Acceleration  
PSCo Public Service Company of Colorado  
RCRA Resource Conservation and Recovery Act  
USGS United States Geological Survey

# Qualified Professional Engineer Certification

I hereby certify, as a Professional Engineer in the State of Colorado, that the information in this document was assembled under my direct supervisory control. This report is not intended or represented to be suitable for reuse by PSCo or others without specific verification or adaptation by the Engineer.

I hereby certify, as a Professional Engineer in the State of Colorado, that the information contained in this report has been prepared in accordance with the requirements of 40 CFR §257. I further certify that a satisfactory demonstration of the requirements of 40 CFR Sections §257.60, §257.61, §257.62, §257.63 and §257.64 have been made.

SIGNATURE:



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# Introduction

This Location Restriction Certification report has been prepared for the existing CCR impoundment (Bottom Ash Pond) located at the Public Service Company of Colorado (PSCo) - Comanche Station (the Site). This report conforms to 40 (CFR) Part 257. This report was prepared to address the federal CCR regulations for disposal of ash under subtitle D of the Resource Conservation and Recovery Act (RCRA). The final rule was published in the Federal Register, Volume 80 Number 74 on April 17, 2015, and became effective on October 19, 2015.

## General Information

Comanche Station is located west of Lime Road approximately three miles south of Colorado Highway 50 in Pueblo County, Colorado as shown in **Figure 1**. The Station is located in the west half of Section 20, Township 21 South, Range 64 West of the 6th Principal Meridian, Pueblo, Colorado. The facility is located in an area zoned I-3 (Industrial) by the City of Pueblo Zoning Department. The CCR Impoundment is located approximately 1,400 feet southeast of the main power plant building. **Figure 2** displays the impoundment location in relation to the various facilities and infrastructure located at Comanche Station.

## Type of Facility

The CCR impoundment is located in the southeastern area of the Site (**Figure 2**). The impoundment was constructed in 1972 and has a surface area of approximately 1.6 acres. Historic documents at the Site indicate that this impoundment was built with a 3-foot thick soil base liner; however, the soil base liner does not meet the requirements of 40 CFR §257.71. The impoundment is approximately 513 feet long by 138 feet wide and 26 feet deep. The primary influent to this impoundment was bottom ash sluiced from Units 1 and 2.

The primary purpose of this impoundment was to settle out bottom ash from the influent water. The dewatered ash was then excavated from this impoundment and transported offsite for encapsulated beneficial use or to an on-Site dry ash disposal facility approximately 1,700 feet west of the impoundment. Additional smaller volume influent sources included the continuous deionization softeners waste, brine and rinse, and activated carbon filter backwash and rinse. Effluent from the CCR impoundment discharged to the immediately adjacent Polishing Pond prior to being discharged to the St. Charles River under the Site's Clean Water Act discharge permit. The impoundment ceased receiving non-CCR waste in January 2021 and CCR waste in June 2021 and has initiated closure.

## Location Restrictions

40 CFR §257.60-64 applies to new CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units.

## Placement Above the Uppermost Aquifer 40 CFR §257.60

The 40 CFR §257.60 places restrictions on locating the base of a new CCR landfill or surface impoundment within 5 feet of the uppermost aquifer. It states the following:

*“New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be constructed with a base that is located no less than 1.52 meters (5 feet) above the upper limit of the uppermost aquifer, or must demonstrate that there will not be an intermittent, recurring, or sustained hydraulic connection between any portion of the base of the CCR unit and the uppermost aquifer due to normal fluctuations in groundwater elevations (including the seasonal high water table).”*

Prior to 2020, the conceptual hydrogeologic model for the site had been well-established based upon numerous site investigations conducted by different engineering firms. These independent studies investigated the geology, geotechnical characteristics and hydrogeology of the site, and all identified the uppermost aquifer to be in the Dakota Sandstone, located beneath approximately 1,450 feet of low-permeable Pierre Shale bedrock. Unconsolidated colluvium was identified overlying the Pierre Shale at an average depth of approximately 20 feet.

Discontinuous perched water of poor quality had been identified within the colluvium, but the investigations concluded that a continuous water table was not present in the colluvium. In late 2020 and 2021, PSCo conducted additional phased site investigations including the use of core drilling to evaluate undisturbed samples of the Pierre Shale. These recent investigations identified groundwater in the weathered shale in the upper 20 feet of the Pierre Shale bedrock, and new wells were installed and added to the groundwater monitoring system. Based upon this new information, the hydrogeologic conceptual site model was updated to reflect a continuous groundwater surface in the weathered shale.

The base grade elevation of the CCR BAP was provided in the Inflow Design Flood Control System Plan (2016). The base grade elevation of the BAP is approximately 4787 feet. Five feet of separation between the BAP base elevation and the water table would be 4782 feet. Water level monitoring has been performed in the updated Comanche monitoring well system over 11 times between August 2020 and June 2021. The monitoring well locations are provided in **Figure 2**. HDR developed groundwater potentiometric surface maps (**Figure 3** provides the groundwater contours for January 2021). The groundwater elevation under the BAP was 4799.31 feet, as measured in W-5B (weathered shale screened well immediately adjacent to the east side of the BAP) in January 2021. The groundwater elevation under the BAP, as measured in a shallow colluvial screened well (W-5) located immediately adjacent to the east side of the BAP in January 2021 was 4803.82 feet. **Based upon this new data, it has been determined that the base of the BAP is not 5 feet above the upper limit of the uppermost groundwater.**

## Wetlands 40 CFR §257.61

The 40 CFR §257.61 places restrictions on locating new CCR landfills and surface impoundments in areas designated as wetlands. It states the following:



*“New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in wetlands, as defined in §232.2 of this chapter, unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that the CCR unit meets the requirements of paragraphs (a)(1) through (5) of this section.”*

### **Definition of Wetlands**

The CFR Regulations (40 CFR §232.2) defines wetlands and other waters of the U.S. as:

- *All waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide.*
- *All interstate waters including interstate wetlands.*
- *All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:*
  - *Which are, or could be, used by interstate or foreign travelers for recreational or other purposes; or*
  - *From which fish or shellfish are, or could be, taken and sold in interstate or foreign commerce; or*
  - *Which are used, or could be used, for industrial purposes by industries in interstate commerce.*
- *All impoundments of waters otherwise defined as waters of the U.S. under the definition.*
- *Tributaries of waters of the U.S. identified above.*
- *The territorial seas.*
- *Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in the paragraphs above. The term “adjacent” means bordering, contiguous, or neighboring. Wetlands separated from other waters of the U.S. by human-made dikes or barriers, natural river berms, beach dunes, and the like are “adjacent” wetlands.*

Wetlands can be waters of the U.S. and are defined by 40 CFR §232.2 (3)(iv) as areas that are *inundated or saturated by surface or ground water at a frequency and duration sufficient to support—and that under normal circumstances do support—a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.*

No wetlands were identified within the project study area. The National Wetlands Inventory incorrectly identified the CCR impoundment as freshwater emergent wetlands. The CCR impoundment is open water with little to no riparian or wetland vegetation. It is isolated from the nearby St. Charles River, and is not considered waters of the United States. Topographic, National Hydrology Dataset, and National Wetlands Inventory maps within and near the project study area are provided in **Figure 4**.

**Based on the site reconnaissance, the CCR impoundment is not located within any known wetlands.**

## **Fault Areas 40 CFR §257.62**

The 40 CFR §257.62 places restrictions on locating new CCR landfills and surface impoundments in close proximity to active fault areas. It states the following:

*“New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located within 60 meters (200 feet) of the outermost damage zone of a fault that has had displacement in Holocene time unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that an alternative setback distance of less than 60 meters (200 feet) will prevent the damage to the structural integrity of the CCR unit.”*

The Holocene time period is defined in the CCR Rule (40 CFR § 257.53) as:

*“The most recent epoch of the Quaternary period, extending from the end of the Pleistocene Epoch, at 11,700 years before present, and continues to present.”*

**The proximity of the Comanche Station to faults that have been active in Holocene time was investigated through research conducted for identifying such fault zones. The results of this research document the absence of Holocene time fault zones within 200 feet from the Comanche Station and the CCR impoundment.**

This conclusion is supported by a review of project reports and published literature that included:

### *Regional Topographic and Geologic Maps and Hydrogeologic Study*

Topographically, the Comanche Station is located on a gently sloping upland area west of Lime Road approximately 3 miles south of Colorado Highway 50 as shown by the U.S. Geological Survey, 2016 map (**Figure 5**). Elevations vary from a high of approximately 4,830 feet AMSL at the southwest and northwest corners of the Station property to a low of approximately 4,800 feet AMSL at the southeast corner. Geologically, the Station resides in unconsolidated materials consisting of Upper Holocene-age colluvium as shown in the Scott, 1969 map (**Figure 6**). The colluvial deposits consist of stiff clays and silts that are intermixed with sand and gravel in some locations. Underlying the colluvium are low-permeability shale deposits. The first consolidated layer beneath the Station property is the Upper Cretaceous-age Pierre Shale bedrock consisting of silty shale containing sandstone and limestone concretions. The Pierre shale is underlain by the chalk and shale deposits of the calcareous Niobrara Formation. The Pierre Shale also crops out along a thin band that extends from the southeastern corner of the site northeastward. Significant geologic activity since before the formation of the Rocky Mountains has not been identified in this formation.

### *Maps and Reports by the Colorado Geological Survey (CGS), and the United States Geological Survey (USGS) relative to faulting in the area.*

Using information from a variety of sources, the Colorado Geological Survey compiled information on nearly 100 potentially hazardous faults in Colorado that ruptured the earth's

surface during the past 2 million years (*Widmann et al., 1998*). These faults are shown as wide lines on the map in **Figure 7**. Faults with evidence of movement during the past 130,000 years are often considered active faults. These faults are shown in red on **Figure 7**. Similar information, while further dividing the Quaternary faults into late, latest, middle and latest Quaternary, is depicted by the interactive Quaternary Fault and Fold Database released by the *U.S. Geological Survey and Colorado Geological Survey, 2006*. In addition to identifying well-constrained or inferred locations of faults, this interactive database also provides information, such as geologic setting, fault orientation, fault type, sense of movement, slip rate, recurrence interval, and the time of the most recent surface-faulting event, on faults and associated folds that are believed to be sources of earthquakes greater than magnitude 6 ( $M > 6$ ). These faults are shown as color-coded lines on the map in **Figure 8**, with the latest Quaternary ( $< 15,000$  years) being denoted by orange. The closest documented latest Quaternary active fault to the site is the Cheraw Mountains fault, which is located approximately 60 miles to the east. Nevertheless, review of available geologic and fault maps does not indicate the presence of active or potentially active faults in the proximity of the Comanche Station that have been active in Holocene or previous time (epoch).

## Seismic Impact Zones 40 CFR §257.63

The 40 CFR §257.63 places restrictions on locating new CCR landfills and surface impoundments in seismic impacted zones. It states the following:

*“New CCR landfills, existing and new CCR surface impoundments, and all lateral expansions of CCR units must not be located in seismic impacted zones unless the owner or operator demonstrates by the dates specified in paragraph (c) of this section that all structural components including liners, leachate collection and removal systems, and surface water control systems, are designed to resist the maximum horizontal acceleration in lithified earth material for site.”*

The Federal Register Volume 80 No. 74 defines a seismic impact zone as the following:

*“A Seismic impact zone means an area having a 2% or greater probability that the maximum expected horizontal acceleration, expressed as a percentage of earth’s gravitational pull (g), will exceed 0.10 g in 50 years.”*

To determine whether the existing CCR impoundment is located in a seismic impact zone, the USGS Earthquake Hazards Program tool was used to determine the earthquake hazard for the Site. The 2009 NEHRP seismic design maps indicated a mapped peak ground acceleration of 0.081 g for the Station area on rock (seismic site classification B). According to the historical May 14, 1979 Stearns-Roger Dwg. No. L-22000, the base of the CCR impoundment was excavated into medium hard to hard claystone, which suggests the entire impoundment is founded on bedrock. Considering the CCR impoundment is founded on bedrock, this corresponds to a seismic site classification C or better. Using the default seismic site classification adjustment factor (1.2) for seismic site classification C, the analysis results in a

design peak ground acceleration of 0.097 g (Attachment A). This calculated design peak ground acceleration value is less than 0.10 g in 50 years.

**Based on the subsurface information and seismic hazard design response spectrum, the peak ground acceleration at the Site is less than the threshold value of 0.10 g in 50 years indicating the existing impoundment is not located in a seismic impact zone.**

## **Unstable Areas 40 CFR §257.64**

The 40 CFR §257.64 places restrictions on locating CCR landfills and surface impoundments in unstable areas. It states the following:

*“An existing or new CCR landfill, existing or new CCR surface impoundment, or any lateral expansion of a CCR unit must not be located in an unstable area unless the owner or operator demonstrates by the dates specified in paragraph (d) of this section that recognized and generally accepted good engineering practices have been incorporated into the design of the CCR unit to ensure that the integrity of the structural components of the CCR unit will not be disrupted. The owner or operator must consider all of the following factors, at a minimum, when determining whether an area is unstable (1) on-site or local soil conditions that may result in significant differential settling; (2) On-site or local geological or geomorphologic features; and (3) On-site or local human-made features or events (both surface and subsurface).”*

**Based on the historical information, subsurface conditions, and considering that the base of the impoundment is founded on bedrock, the existing impoundment is not located in an unstable area.**

The ground surface around the CCR impoundment is relatively flat on the north, south, and east sides. The perimeter access road on the west side of the impoundment is on a constructed embankment according to the historical May 14, 1979 Stearns-Roger Dwg. No. L-22000 and visual observations from HDR's September 2018 site visit. The natural land surface in the vicinity of the impoundment is relatively flat and lacking in characteristics that could result in instability.

Slope stability analysis was performed for the earth embankment on the west side of the impoundment. Analysis was performed using Slope/W 2018 software utilizing Spencer's method which satisfies both force and moment equilibrium to compute the critical factor of safety. Conservative soil parameters were selected for the stability analysis based on experience with similar materials and the results of historical subsurface explorations on-site. Slope stability analysis resulted in factors of safety greater than the required minimum values for long term drained loading conditions in Table 2-4 in Section 2.7.3 of the EPA Technical Manual for Solid Waste Disposal Facility Criteria, 40 CFR Part 258, dated November 1993 (EPA530-R-93-017).

Considering the base of the impoundment is underlain by medium hard to hard claystone and the western perimeter road embankment is constructed with compacted clay and claystone fill, subsurface soils at the base of the impoundment exhibit low compressibility characteristics and



high shear strengths. This further confirms that the impoundment is not located in an unstable area.

## Summary

The Comanche Station CCR impoundment meets and/or exceeds location restriction requirements required for existing impoundments detailed in 40 CFR Part 257. The specific rules evaluated for the aforementioned impoundment from 40 CFR Part 257 are listed below:

- 40 CFR §257.60** – Upper Most Aquifer
- 40 CFR §257.61** – Wetlands
- 40 CFR §257.62** – Fault Areas
- 40 CFR §257.63** – Seismic Impact Zones
- 40 CFR §257.64** – Unstable Areas

# References

- 1) Comanche Unit 3 Generating Station, Comanche Station, Pueblo, Colorado, URS 2005.
- 2) Comanche Station Ash Disposal Facility Engineering Design and Operations Plan, Pueblo, Colorado, HDR September 2017, Revised January 2018.
- 3) Crone, A.J., Machette, M.N., Bradley, L.A., and Mahan, S.A. 1997, Late Quaternary surface faulting on the Cheraw fault, southeastern Colorado: U.S. Geological Survey Miscellaneous Geologic Investigations I-2591, 7 p. pamphlet, 1 pl.
- 4) Feasibility Investigation, Two Ash Disposal Areas for Comanche Station, Pueblo, Colorado, Woodward- Clyde Consultants, 1987.
- 5) GeoTrans, Inc., 2009. Surface Water Impoundment Infiltration Characterization Analysis, Public Service Company of Colorado, Comanche Station, Pueblo, Colorado. December 1, 2009.
- 6) Scott, G.R., 1969, Geologic Map of the Southwest and Southeast Pueblo Quadrangles, Colorado: U.S. Geological Survey Geologic Quadrangle Map I-597, scale 1:24,000.
- 7) Tetra Tech, 2012. Inventory and Preliminary Classification Report, Waste Impoundments, Comanche Station, Pueblo, Colorado. November 1, 2012.
- 8) Tetra Tech, 2013. Evaluation of Monitoring Well MW-3 and ADF Stormwater Pond Water Quality Chemistry at the Public Service Company of Colorado Comanche Station in Pueblo, Colorado. March 29, 2013.
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- 10) U.S. Geological Survey and Colorado Geological Survey, 2006, Quaternary fault and fold database for the United States, accessed September 21, 2018, from USGS web site: <http://earthquake.usgs.gov/hazards/qfaults/>.
- 11) U.S. Geological Survey, 2016, Southeast Pueblo Quadrangle, Pueblo County, Colorado - 7.5 Minute Topographic Map Series, 1:24,000.
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- 14) HDR, 2018. CCR Impoundment Slope Stability Analysis. October 16, 2018